

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION

NW MONITORING LLC, a Delaware
limited liability company,

Plaintiff,

v.

SUSAN L. HOLLANDER, et al.

Defendants.

No. 3:20-cv-05572-RSM

SECOND STIPULATED MOTION AND
ORDER REGARDING DISCOVERY AND
FED. R. CIV. P. 26(f) DEADLINES

Noting Date: April 28, 2021

**SECOND STIPULATED MOTION REGARDING DISCOVERY
AND FED. R. CIV. P. 26(f) DEADLINES**

All Parties jointly file this Second Stipulated Motion Regarding Discovery and Fed. R. Civ.
P. 26(f) Deadlines.

BACKGROUND

Plaintiff filed their Complaint (Dkt. 1) on June 16, 2020. On June 23, 2020, the Court issued
an Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement that set the
deadline for the parties to conduct a Rule 26(f) conference as September 8, 2020; the deadline for
initial disclosures as September 14, 2020; and the deadline for filing a Combined Joint Status Report
under Rule 26(f) as September 21, 2020 (Dkt. 5).

1 On or around August 12, 2020, Defendants Jeffery D. Parkinson, 4319 Consulting, Inc., and
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3 the Marital Community of Parkinson (defendants Parkinson) filed a Motion to Dismiss the complaint
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5 (Dkt. 13).
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8 On August 20, 2020, Defendants Susan L. Hollander and the Marital Community Comprised
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10 of Susan L. Hollander (defendants Hollander) filed a Motion for Partial Dismissal of Plaintiff's
11
12 Complaint and joined in Defendant Parkinson's motion to dismiss (Dkt. 16).
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15 On August 21, 2020, Defendant Charlene Wolfe (defendant Wolfe) filed a Joinder to the
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17 Motion to Dismiss and Partial Motion to Dismiss (Dkt. 17 and 18).
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20 On September 8, 2020, pursuant to an agreed request of counsel in light of the pending
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22 motions to dismiss, the Court continued the deadlines 45 days.
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25 On October 16, 2020, the Court granted the parties' Stipulated Motion and Order Regarding
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27 Discovery and Fed. R. Civ. P. 26(f) Deadlines (Dkt. 25). The Order set the following deadlines:
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- 29 1. The deadline for the parties to conduct a Rule 26(f) conference shall be
30 continued to the later of December 15, 2020, or fourteen (14) days after the
31 Court issues a ruling on Defendants' Motions to Dismiss, if anything
32 remains of the action at that time.
- 33 2. The deadline for the Defendants to file their respective Answers to the
34 Complaint shall be twenty (20) days after the Court issues a ruling on
35 Defendants' Motions to Dismiss.
- 36 3. The deadline for the parties to exchange initial disclosures shall be
37 continued to seven (7) days after the continued Rule 26(f) conference
38 deadline.
- 39 4. The deadline for the parties to submit a Joint Status Report to the Court
40 shall be continued to fourteen (14) days after the continued Rule 26(f)
41 deadline.
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45 On April 15, 2021, the Court entered an Order granting in part and denying in part
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47 Defendants' motions to dismiss, and granted Plaintiff NW Monitoring LLC leave to amend its
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49 complaint within 21 days of the Order (Dkt. 26).
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1 Except as set forth above, no other pre-trial deadlines have been requested to date.

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3 **MOTION**

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5 As currently set, the case schedule contemplates the parties conducting their Rule 26(f)
6 conference, and Defendants filing their answers, prior to the deadline for Plaintiff to amend its
7 complaint. For efficiency, and pursuant to Local Rule 7(d)(1), the parties jointly move that the
8 Court enter an order as follows:
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11 1. The deadline for the parties to conduct a Rule 26(f) conference shall be continued to
12 fourteen (14) days after all Defendants have filed their Answers to the Complaint or Amended
13 Complaint.
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16 2. The deadline for the parties to exchange initial disclosures shall be continued to seven
17 (7) days after the continued Rule 26(f) conference deadline.
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20 3. The deadline for the parties to submit a Joint Status Report to the Court shall be
21 continued to fourteen (14) days after the continued Rule 26(f) deadline.
22

23
24 DATED April 28, 2021.

25
26 YOUNGLOVE & COKER, P.L.L.C.

27
28 s/Gregory M. Rhodes
29 GREGORY M. RHODES, WSBA #33897
30 Attorney for Defendant Wolfe

31
32 DATED April 28, 2021.

33
34 PERKINS COIE, LLP

35
36 s/Christian W. Marcelo
37 CHRISTIAN W. MARCELO, WSBA #51193
38 DAVID A. PEREZ, WSBA #43959
39 Attorneys for Defendants Parkinson and 4319
40 Consulting, Inc.

1 DATED April 28, 2021.

BEAN LAW GROUP

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4 s/Matthew J. Bean

5 MATTHEW J. BEAN, WSBA #23221

6 CODY FENTON-ROBERTSON, WSBA #47879

7 Attorneys for Defendants Hollander, M.D.

8
9 DATED April 28, 2021.

ZEHNDER LAW LLP

10
11
12 s/John E. Zehnder

13 JOHN E. ZEHNDER, WSBA #29440

14 JOSEPH P. ZEHNDER JR., WSBA #28404

15 Attorneys for Plaintiff NW Monitoring LLC

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19 **ORDER**

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21 Pursuant to Stipulated Motion, IT IS SO ORDERED.

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23 DATED this 29th day of April, 2021.

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31 RICARDO S. MARTINEZ

32 CHIEF UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I certify under penalty of perjury that on April 28, 2021, I caused to be electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the attorneys of record:

<p>John E. Zehnder, Jr., WSBA #29440 johnz@zehnderllp.com Joseph P. Zehnder, WSBA #28404 joez@zehnderllp.com Zehnder Law LLP 6625 Wagner Way NW, Suite 203 Gig Harbor, WA 98335 Phone: 253-235-3536 Fax: 253-276-6700</p> <p>Attorneys for Plaintiff NW Monitoring LLC</p>	<p><input type="checkbox"/> U.S. Mail <input type="checkbox"/> E-Mail <input checked="" type="checkbox"/> E-File <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Delivery</p>
<p>Cody Fenton-Robertson, WSBA #47879 cody@beanlawgroup.com Matthew J. Bean, WSBA #23221 matt@beanlawgroup.com Bean Law Group 2200 Sixth Avenue, Suite 500 Seattle, WA 98121-1843 Phone: 206-522-0618 Fax: 206-524-3751</p> <p>Attorneys for Defendant Susan L. Hollander</p>	<p><input type="checkbox"/> U.S. Mail <input type="checkbox"/> E-Mail <input checked="" type="checkbox"/> E-File <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Delivery</p>
<p>Gregory M. Rhodes, WSBA #33897 grhodes@ylclaw.com Younglove & Coker 1800 Cooper PT RD SW, Suite 16 Olympia, WA 98507 Phone: 360-357-7791 Fax: 360 754-9268</p> <p>Attorney for Defendant Charlene Wolfe</p>	<p><input type="checkbox"/> U.S. Mail <input type="checkbox"/> E-Mail <input checked="" type="checkbox"/> E-File <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Overnight Delivery</p>

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2
3
4 DATED this 28th day of April, 2021.
5

6 /s/ Christian W. Marcelo

7 Christian W. Marcelo, WSBA No. 51193

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16 JEFFERY PARKINSON and his

17 COMMUNITY PROPERTY, and 4319

18 CONSULTING, INC.
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